

Exhibit A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

3	In re:	§	Chapter 11
		§	
4	BRAZOS ELECTRIC POWER	§	
	COOPERATIVE, INC.	§	Case No.
5		§	21-30725 (DRJ)
	Debtor.	§	
6		§	
		§	
7	BRAZOS ELECTRIC POWER	§	
	COOPERATIVE, INC.	§	
8		§	
	Plaintiff	§	
9		§	Adv. Proc. No.
	VS.	§	21-03863 (DRJ)
10		§	
	ELECTRIC RELIABILITY	§	
11	COUNCIL OF TEXAS, INC.	§	
		§	
12	Defendant	§	
	_____	§	

VIDEOTAPED ORAL DEPOSITION OF

TRAVIS DEAN THRALL

Waco, Texas

Friday, November 5, 2021

Reported by:

MICHEAL A. JOHNSON, RDR, CRR

JOB NO. 202310

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2 MR. WADE: Eric Wade, Unsecured
3 Creditors Committee.

4 MR. PARKER: Ross Parker here on
5 behalf of the Electric Reliability Council of
6 Texas.

7 MS. ANDERSON: Toni Anderson for
8 ERCOT.

9 MR. ALIBHAI: Jamil Alibhai for ERCOT.

10 MR. PARKER: On Zoom?

11 TRAVIS DEAN THRALL,
12 called as a witness, having been duly sworn by a
13 Notary Public, was examined and testified as
14 follows:

15 EXAMINATION

16 BY MR. PARKER:

17 Q. Mr. Thrall, please state your name for
18 the record.

19 A. Travis Dean Thrall.

20 Q. And do you prefer to go by Dean?

21 A. Yes, sir.

22 Q. Dean, can I call you Dean or you want
23 me to call you Mr. Thrall?

24 A. Dean is fine.

25 Q. Okay. Thank you, sir. Dean, my name

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2 the least efficient from a heat rating standpoint?

3 A. They have better efficiency than
4 Miller 4 and 5, but their cost to be online is
5 higher than 4 and 5, and 4 and 5 is just a lot of
6 times used as a peaker unit.

7 Q. What is the total daily megawatt
8 generation at Miller from the five units, if
9 Miller 1 was running?

10 A. I believe all six of them, if you're
11 looking at a realtime, I believe is 610 megawatts.

12 Q. You said all six of them.

13 A. All five of them. Sorry.

14 Q. So you think Miller, in an optimal
15 situation with Miller 1 running, it will produce
16 610 megawatts a day?

17 A. That would be the realtime. I
18 don't -- I couldn't guess what the day would be.

19 Q. Okay.

20 MR. TRAHAN: Ross, before you go on,
21 you've raised some -- you've asked some questions
22 about winterization, and with respect to, I think
23 it was Exhibit No. 2 and now you've asked some
24 questions about generation and capacity in
25 connection with Exhibit 3. I expect more

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2 questions about those topics generally,
3 winterization and generation capacity, given the
4 documents that you shared with us yesterday
5 evening. I'd like to make a running -- a
6 relevance objection to those two topics, as
7 opposed to just objecting each time you ask a
8 related question.

9 MR. PARKER: So your objection is
10 form?

11 MR. TRAHAN: My objection's going to
12 be form, but I want you to understand it if it's a
13 running objection. We object to the relevance of
14 those two topics --

15 MR. PARKER: Okay.

16 MR. TRAHAN: -- winterization or
17 generation capacity. Are you okay with me --

18 MR. PARKER: You have your form
19 objection.

20 MR. TRAHAN: You want me to have to
21 lodge it each time?

22 MR. PARKER: No, I'm fine with your
23 running -- it's a running form objection pursuant
24 to Texas rules, but that's fine. You can have a
25 running objection.

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2 MR. TRAHAN: A running form objection
3 for questions relating to winterization or
4 generation capacity.

5 MR. PARKER: Fair enough.

6 MR. TRAHAN: All right. Thank you.

7 BY MR. PARKER:

8 Q. So Miller, 610 megawatts a day on
9 the -- if it's running -- if Miller -- if Unit 1
10 is running, right?

11 A. It wouldn't be potentially per day.
12 That's the maximum HSL. On a given momentary
13 basis, it could be. So it would be whatever
14 megawatt it ran times the hours of day that it ran
15 to get you the megawatt hours for that day, which
16 we wouldn't know because it's -- the ERCOT market
17 moves it around to whatever the need is based on
18 the bid curve. So I can't tell you what the
19 expected output is that day other than the
20 runtimes and the LSL and HSL that we've given
21 ERCOT and if we've sold ancillaries or not or if
22 we've sold energy. The actual amount it can
23 produce on a daily basis is unknown.

24 MR. PARKER: I'm going to object as
25 nonresponsive.

C E R T I F I C A T E

STATE OF _____)
)
) ss.:
)
 COUNTY OF _____)

I, MICHEAL A. JOHNSON, a Notary
 Public within and for the State of Texas, do
 hereby certify:

That TRAVIS DEAN THRALL, the witness
 whose deposition is hereinbefore set forth, was
 duly sworn by me and that such deposition is a
 true record of the testimony given by such
 witness.

I further certify that I am not
 related to any of the parties to this action by
 blood or marriage; and that I am in no way
 interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
 set my hand this 9th day of November, 2021.



MICHEAL A. JOHNSON, RDR, CRR